LUS & LUS Fiber Investigation & PSC Audit



MARCH 2018

"The Hayride" Article





A number of years ago, micro-payments were all the rage online. The theory is, if enough people give just one dollar a month for a smart idea, its inventor could become a millionaire.



APRIL 2018

PSC Self-Report | \$1.7M



Improving the way you he

April 12, 2018

Commissioner Eric Skrmetta Louisiana Public Service Commission 433 Metairie Road, Suite 406 Mctairie, LA 70005

Commissioner Lambert C. Boissiere, III Louisiana Public Service Commission 1450 Poydras, Suite 1402 New Orleans, LA 70112

Commissioner Foster L. Campbell Louisiana Public Service Commission 415 Texas Street, Suite 100 Shreveport, LA 71101

Commissioner Mike Francis Louisiana Public Service Commission 222 N. Parkerson Avenue Crowley, LA 70526

Commissioner Craig Greene Louisiana Public Service Commission 10713 North Oak Hills Pkwy., Suite B Baton Rouge LA 70810

RE: Lafayette Utilities System - Communications Division

Dear Commissioners:

We understand the Louisiana Public Service Commission will consider at its April 18, 2018 Business & Executive Session a proposed Directive to initiate an audit of Lafayette Utilities System's Covered Services for its fiscal year 2016-2017, pursuant to the Local Government Fair Competition Act and the Commission's Cost Allocation and Affiliate Transaction Rules in its General Order R-28270.

While the Local Government Fair Competition Act ordinarily requires that the Commission shall have the authority to conduct a periodic compliance audit as deemed appropriate based on its review of LUS's annual attest audit which is required by the Commission's rules, and which is conducted annually by an independent auditor selected from the list of auditors approved by the legislative auditor, LUS welcomes the proposed audit by the Commission in this instance.

LUS has worked diligently to comply with the Local Government Fair Competition Act and the Commission's Cost Allocation and Affiliate Transaction Rules, and has received overall positive audit results from the Commission's initial audits that covered fiscal years from 2008-2012. Moreover, LUS has endeavored to continually analyze its operations and self-report potential violations for examination as part of the annual attest audit process.

In recent weeks, investigation by LUS has determined that certain fiber service that was requested from and installed by the Communications division at the request of affiliate divisions have not been fully utilized. The Communications division treated the affiliates as it would any

> 1314 WALKER ROAD | LAFAYETTE, LA 70506 | P.O. 80X 4017-C | LAFAYETTE, LA 70502 | LUS.ORG 14754330_1

> > Electric | Water | Wastewater i Fiber

April 12, 2018

other customer - - it provided the fiber installation and made the fiber service available as requested. Moreover, like for any other customer, the Communications division billed the affiliates for the fiber service. The Communications division charges to its customers are not based on or determined by levels of actual usage of the fiber service provided. Nevertheless, considering the affiliate nature of the transactions, LUS will report the facts to the attest auditor to be evaluated and considered in the upcoming audit for the most recent fiscal year which ended October 31, 2017, to determine whether any violations of the Local Government Fair Competition Act or the Commission's Cost Allocation and Affiliate Transaction Rules have occurred. Meanwhile, as a precautionary measure, the Communications division will credit to the affiliate divisions the funds received for such service pending the completion and outcome of the audit determination.

The annual attest audit required by the Commission rules will begin in May, and the results are typically filed with the Commission by August. As indicated above, LUS welcomes the proposed audit by the Commission so that it can likewise review the affiliate transactions that are being reported by LUS for review by the attest auditor.

Sincerely,

Terry Huval Director of Utilities

Mayor-President

cc: Brandon Frey, Executive Secretary

14754330 1



SEPTEMBER 6, 2018

Memo to Human Resources





Internal Memorandum

Lafayette Utilities System Water Treatment Division (7040)

TO: Rick Zeno

DATE: September 6, 2018

FROM: Craig Gautreaux

SUBJECT: Lift Station Telemetry

Mr. Zeno, fiber to the lift station started in 2010 as we were having line of sight issues with our existing telemetry. The existing telemetry installed in 1998, used a radio controlled signal to the SCADA room at Walker Road to notify us of high levels and we had a new form of internet technology called a Mission Auto Dialer installed around 2003 which called the on-call lift station mechanic when a high level alarm came in. The other telemetry by radio monitored several critical systems at the lift station and not just the high level. A few of the alarms were: high float, low float, pump seal alarm, ac supply alarm, intrusion alarm, pump run times, pump fail to start and force main discharge pressure. The SCADA operator monitored the alarms and notified dispatch who called the mechanic out to see about the problem. Wastewater was not being charged for in house telemetry and Mission auto dialers were costing us about \$40.00 per month per installment and probably had about ten (10) auto dialers in the system.

That being said, fiber was just coming on line and they naturally were looking for the best use the fiber within LUS between water, sewer and electric and city hall, Frank Ledoux had set up a meeting to see what we could contribute to fiber and we had thirtyfive (35) lift station that were on existing radio telemetry at Walker road, Those were the first ones that they made me a deal I could not refuse for \$210.00 per month per station for 10 meg/station. It was told to Frank that this would be work in progress because we had to do research as to what would work in those stations to get them ready to talk to the fiber network and the existing SCADA inputs at Walker Road had to be reconfigured. The technology required was above my head so I enlisted Warren Boudreaux, Tim Sheen and Chris Domingue to handle the details and I would do my best to secure funding for this initial venture into fiber. At that point in time the fiber to the home project had not started but was independent of the next phase. Fiber started to run to those stations in 2011 and starting charging my account for the full price knowing we were going to need some time to get these lift station control panels changed out from radio technology to programmable logic controllers that talked Modbus that talked to fiber. Those were the easiest ones to change over because they were our newest panels. Money was tight to start and with the bid laws of the \$30,000.00 per year to purchase the needed parts for conversion we proceeded. In the d wastewater departments money was tighter than electric so I did my best to folks get purchase orders done with the funding available to get the fiber rolling.

2013 came around the fiber to home initiative took off, Frank called another to let water, sewer and electric know that they were looking for additional it is install fiber. Fiber looked at the serviceable lift station locations that they to while running fiber into the neighborhoods. There were sixty-six (66) ble locations for them to run fiber to at a cost of \$210.00 per month. We were hough converting the original thirty-five (35) yet and received sixty-six (66) convert. These were the ones we had no available technology designed and install at these lift stations much less providing a monitoring protocol at the load SCADA operations for the screens and alarm setup. We also started the on of the water plant, towers and wells to fiber for additional revenue to the fiber These sites were also radio telemetry and had to be converted to talk fiber at content.

e 2010 our lift station control panels, built by the civil engineering department, sting the developers about \$10,000.00 and civil engineering would provide the anel to the developers building new subdivisions or mini malls. These were the e we were working on because they were specified with radio telemetry built in. ked Civil Engineering to come up with a cheaper control panels because ars were complaining of costs. George Womack a botal electrical engineer was with developing a new panel and we asked that they be fiber ready when

There was a prototype built in 2011 and tested, Civil Engineering went out for n (10) new panels. These new panels were going to be the ones that we to replace at the sixty-six (66) plus service locations throughout the city to the older control panels that did not have any type of telemetry except for the auto dialers. The new panels started to get installed in lift stations at new ion developments, street developments and new strategic locations for future eds. Problems starting surfacing in the field with these new panels because it the vendor to make adjustments to the software in the PLC programmable ntroller any time there was an electrical glitch on the system. Our instrument ans were tasked to connect the wires for these panels and were trying to figure these devices worked. The panels were not back lit, so any time we had a at night additional resources had to be brought in to light up the panel. You gine at night during a storm event how pleased they were with the new panels. of these issues, engineering contracted with Domingue and Szabo in 2016 to and create a new panel that was more plug in and the contractor was ible for all wiring and hooking up to fiber, that in fact has taken some time to through our engineering section and we currently installed our first new e in May of 2018.

use Civil engineering was not going to build any more George Womack panels other lift stations, I asked Chris Domingue in 2015 to come up with a solution

e asked is when we were having issues why not disconnect from fiber. whole goal was for LUS to support fiber, a sister agency to be e knew that this was work in progress and eventually we would have nected which we do, it just took some time and I did not think 5 to 6 years nable time to deploy new technology. I think on fiber's part they technology where they could activated it for revenue and never looked wer offered any more technical help that what I had, even though I asked I away and Tim sheen retired leaving Chris Domingue to help during years of deployment. Personally, if fiber would have only run the fiber to charged a connect fee and not light up the fiber until we were ready it technology then none of this would have occurred, but the goal was to riber so they lit it up. They no longer have that policy, but in its infancy is way they did things and I paid the bills on time as I felt I was directed

I had Mission Auto Dialers for \$40.00 per month versus fiber at \$420.00. ed to use fiber and that is where we are today. I still have Mission Auto re covering my system until such time as I can afford another build out for y charge for too. Terry knew how many stations were connected to fiber, e were behind on installations but in the end I do not think he realized allation we were behind. If someone would have let me know that non are an issue, we may or may not have been allowed to disconnect. As a bould participate in was funding the budget and have my employees he installations. Contracts for vendors and designing and bidding out was a function of Civil Engineering and design of SCADA was a function and Distribution and System Engineering. So you can see that this y task to deal with. We currently have 189 lit stations of which 100 are unicating with fiber and approximately 40 are on Mission Auto Dialer, city, with the remainder using red lights with customer call ins.

ave any questions, please call me.

ater Operations Manager

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SEPTEMBER 6, 2018

Memo to Human Resources

- Memo from LUS management related to how this self-reported issue could have occurred:
- "Terry knew how many stations were connected to fiber. He knew we were behind on installations."
- "...If Fiber would have only run the fiber to the stations and charged a connect fee and not lit up the fiber until we were ready with the installed technology then none of this would have occurred, but the goal was to raise money for Fiber, so they lit it up."



SEPTEMBER 6, 2018

Memo to Human Resources

- "They no longer have that policy, but in its infancy stage, that is the way they did things and I paid the bills on time as I felt I was directed to do."
- "Remember, I had Mission Auto Dialers for \$40 per month versus fiber at \$420. We were directed to use fiber and that is where we are today. I still have Mission Auto Dialers out there covering my system..."



SEPTEMBER 2018

LUS / LUS Fiber Split

LUS would not have <u>mistakenly</u> or <u>intentionally</u> paid COX or AT&T for unconnected services.



JUNE 2019

PSC Audit Memo

Louisiana Public Service Commission



POST OFFICE BOX 91154 BATON ROUGE, LOUISIANA 70821-9154

COMMISSIONERS

District II

Mike Francis, Chairman,
District IV
Foster L. Campbell, Vice Chairman
District V
Lambert C. Boissiere III
District III
Eric F. Skrmetta
District I
Craig Greene

Telephone: 225-342-9888

BRANDON M. FREY Executive Secretary Executive Counsel

JOHNNY E. SNELLGROVE, JR Deputy Undersecretary

LA PUBLIC SERVICE COMMISSION

June 4, 2019

VIA HAND DELIVERY

Ms. Terri Bordelon Louisiana Public Service Commission Records and Recordings Division 602 N. 5th Street Galvez Bldg. 12th Fl. Baton Rouge, LA 70802

CONFIDENTIAL

Re: DOCKET NO. X-34830 - Louisiana Public Service Commission, ex parte. In re: Audit of Lafayette Utilities System's Covered Services under General Order of the Louisiana Public Service Commission dated October 4, 2005 for the years 2016-2017.

Dear Ms. Bordelon:

Please find enclosed for filing both the confidential version (to be filed under seal) and the public version of the Audit Memorandum, with exhibits, prepared by William J. Barta of Henderson Ridge Consulting, Inc. to be filed in the above-referenced docket on behalf of the Louisiana Public Service Commission Staff. By filing this Audit Memorandum, this matter may now be published in the Commission's Official Bulletin for intervention and comment as Docket No. U-34830.

Thank you for your assistance in this matter. Should you have any questions, please do not hesitate to contact me at (225) 342-5703.

Sincerely.

Lawen M. Dement

Lauren M. Temento Staff Attorney

Encl.

cc: Randy Young William J. Barta



JUNE 2019

PSC Audit Memo

most cost effective service contract to meet the long-term needs of that location." 15

Staff agrees with the findings of the independent auditor regarding the provision of the Communications System services to Government affiliates based upon the terms of month-to-month offerings. Staff recognizes that it may not be cost-effective to render the low, monthly charges billed many LUS and LCG locations under a long-term contract. But other divisions and departments incur substantial monthly billings from the Communications System and appear to be candidates to secure long-term contracts. For instance, Table 12 presents the fiscal year 2017 billings for a few of the affiliated Government accounts with much higher monthly charges.

Table 12
Communications System
Fiscal Year 2017 Billings to
Higher Revenue LCG and LUS Accounts

Account	2017 FY Billings
LCG IS&T Hosted Voice	\$99,400
LUS Electric	710,314
LUS AMI Gatekeeper	615,543
LUS Water Operations	136,901
Lafayette Utilities System (SCADA)	47,910
LUS Wastewater	205,445
Lafayette Utilities System (Power Outage Monitoring)	1,013,400
LCG Traffic Control	149,363
Lafayette Police Department	152,643
LCPCG - Wholesale	415,764
LUS Telecom - Wholesale	1,467,624

³⁵ See LUS response to Staff Data Request No. 1-24.8 (Bates No. LUS 010502).

Audit Memorandum - Confidential Version Audit of LUS' Covered Services June, 2019 Page 55



JUNE 2019

PSC Audit Memo

Table 12 Communications System Fiscal Year 2017 Billings to Higher Revenue LCG and LUS Accounts

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LCG IS&T Hosted Voice	\$99,400
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POWER OUTAGE MONITORING SYSTEM - POMS

- LUS Fiber, as part of its existing build-out, had the ability to detect whether or not service to the home of one of their customers was interrupted (for any number of reasons).
- There are many internal emails and memos back and forth between LUS senior management suggesting that this existing Fiber system could be used as a Power Outage Monitoring System for Utilities, how to price it, and the need for cash within the Fiber division.



POWER OUTAGE MONITORING SYSTEM - POMS

- The <u>Fiber system only provided data on Fiber customers</u> representing a fraction of Utility's customers.
- The price of POMS was based on "savings to customers."
- The Fair Competition Act and PSC Rules required fullcost-accounting (ie; what it cost Fiber to provide the service).



POWER OUTAGE MONITORING SYSTEM - POMS

- In late 2010, Fiber starts billing LUS \$20k+ per month for POMS based on an economist's estimate of the cost of an outage.
- July 2011, Fiber increased the monthly amount billed to LUS for POMS to \$84k+ based on the economist's new memo estimating cost of an outage.
- On the same day that the economist issued the new memo, an email was sent to Terry from Accounting questioning the pricing mechanism.



JULY 19, 2011

Historical Correspondence

From: Kerney Simoneaux < KSimoneaux@LafayetteLA.gov>

Sent: Tuesday, July 19, 2011 10:28 PM

To: Terry Huval

Cc: Frank Ledoux; Mona Simon; AntonioConner; Joan Parish; AlisonAlleman; Santhoshi

Chander; Lorrie Toups

Subject: Pricing of Outage Service

Terry,

I was thinking driving home about the pricing of this service and I remembered the PSC Rules dictates how to price services. Assuming the outage service is non-tariff and we're not offering it to anyone else the service should be priced at full cost. Below is the language from our CAM:

Transfers or sales of non-tariffed goods or services between the Communications Division and other affiliated divisions that are not provided to unaffiliated outside parties will be recorded under the full-cost accounting methodology.

I hope this helps.

Kerney



JULY 19, 2011

Historical Correspondence

From: Sent: Terry Huval <THUVAL@lus.org> Tuesday, July 19, 2011 10:57 PM

To:

Kerney Simoneaux

Cc:

Frank Ledoux; Mona Simon; Antonio Conner; Joan Parish; Alison Alleman; Santhoshi

Chander; Lorrie Toups

Subject:

Re: Pricing of Outage Service

We can make this same service to any other entity that wants to purchase it.

Thanks for passing this on.

Terry

From: Kerney Simoneaux

Sent: Tuesday, July 19, 2011 10:27 PM

To: Terry Huval

Cc: Frank Ledoux; Mona Simon; Antonio Conner; Joan Parish; Alison Alleman; Santhoshi Chander; Lorrie Toups

Subject: Pricing of Outage Service

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I hope this helps.

Kerney



JULY 20, 2011

Historical Correspondence

 From:
 Terry Huval <THUVAL@lus.org>

 Sent:
 Wednesday, July 20, 2011 7:59 AM

 To:
 Katherine King; Randy Young

Subject: Cost of outages

Attachments: DOE-Review-of-Customer-Outage-Costs-Nov-2003.pdf

Katherine and Randy,

I will be on a call in a few minutes, but will get with you by about 8:30 on this. Here is the story:

This is an effort I have been leading to have LUS pay LUS Fiber for the new capability LUS has to more quickly detect and respond to power outages. LUS is already paying fiber about \$20,000 a month for this service, but a recent study we acquired through our friends in Chattanooga includes information that suggests that it could be justified that LUS pays more.

I'm visiting first thing this morning with the economist with the economic development authority. I am trying to have this resolved by 9:30 am to submit for the budget.

We have openly discussed this with Finance, which has been supportive. However, Kerney sent me something last night that may throw water on our aspirations for this to become a significant LUS Fiber revenue source. I am not sure what the implications are and I need a quick read from you on it. Here it is:

"Terry,

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I hope this helps.

Kerney"



JULY 20, 2011

Historical Correspondence

- Terry asked for an opinion from LUS's lawyer.
- The lawyer billed for four hours of research but provided no written legal opinion.
- No follow-up email from Terry asking about his request.



APRIL 20, 2018

Memo to File



Internal Memorandum

Lafayette Utilities System Director's Office (7000)

TO: File

DATE: April 20, 2018

FROM: Terry Huval

SUBJECT: Electric Outage Monitoring System

In an effort to provide more responsive restoration of electric services, LUS implemented an Electric Outage Monitoring System in 2011 to help personnel more effectively determine the source and location of an electric power outage, and thus be able to restore services more

Established industry indices, applicable to all electric utilities, are used to determine the frequency and duration of electric outages. In addition, the Department of Energy (DOE) has established a calculator to determine the financial cost of an electric outage. Using these metrics, the concept of the Electric Outage Monitoring System was to reduce the length and cost of electrical outages.

Since there were no established operating systems to detect electrical outages on a home-byhome basis, LUS considered the use of its city-wide LUS Fiber system to provide outage detection information. This was possible because the LUS Fiber system sends a signal to a central control center whenever a location on its telecommunications system loses power. By using these same signals, LUS is able to utilize this information to determine the root cause location of an outage.

It was LUS's primary assumption that the use of this Electric Outage Monitoring System would reduce electric outage durations by 20 minutes. The pricing of the service was based on reducing the cost of electric outages.

In the authorization memo request by Mike Boustany to Terry Huval dated July 20, 2011 (copy attached), the assumption was that reducing the length of outages by an average of 20 minutes would save LUS customers an estimated \$2.03 million a year. The accepted recommendation by Mr. Boustany was to use half of those savings to pay LUS Fiber for providing this unique

Since the benefit of electric outage occurrences have a direct impact on multiple LUS Divisions. the cost was divided amongst the contractual services of four (4) LUS Divisions - Customer Services, Electric T & D Operations, Electric Energy Control Center and Substation Operations. The total increase in the contractual services line item for all these divisions was \$1,013,400 per year, or an 8.50% increase in the total contractual services line item for these departments.



APRIL 20, 2018

Memo to File

It was LUS's primary assumption that the use of this Electric Outage Monitoring System would reduce electric outage durations by 20 minutes. The pricing of the service was based on reducing the cost of electric outages.



MAY 2019

Staff Interviews Begin

- Interviews with numerous participants regarding POMS origination and pricing:
- Jeff Stewart
- Teles Fremin
- Kerney Simoneaux
- Antonio Connor

- David Demourelle
- Burton Kolder
- Randy Young
- Mike Hebert



MAY 2019

Staff Interviews Begin

How do we justify a million+ dollars a year?

- "Do I think the value is one million dollars? No... Would I place the value of providing that service to someone at one million dollars? No...Do I agree that a million dollars is what it should have been? No, but I don't know what that number would be."
- "In my opinion, <u>l've always thought it was kind of a stretch</u>...as someone who works in the industry, <u>that's why we are eliminating it, to be honest with you.</u>"



MAY 2019

Staff Interviews Begin

Was there a need for POMS?

- "We had a few discussions internally, and that's where we came up with our decision to eliminate it...I imagine it's always been one of those things of 'do we need it or not."
- "The outage management redundant system was probably our biggest, 'oh man, we got to get rid of this...' We need to let it fall off the books because we're not seeing the justification..."



MAY 2019

Staff Interviews Begin

Was there a need for POMS?

- When asked to explain how the system works "If someone unplugs their Ethernet cable, we get an alarm, disconnects power from it, we get an alarm. It's multiple things...You get an alarm if you lose power, you get an alarm if you lose battery...you don't just get an alarm that you lost power."
- POMS' function was described as "a service from LUS
 Fiber as a <u>backup...in case we needed...I don't know how</u>
 often it was being used..."



MAY 2019

Staff Interviews Begin

Comments about eliminating POMS

- Had you ever heard discussions or comments about needing to keep this? "Not that they really need to keep it for usefulness, ...the discussion was around, 'do we need to keep it from a revenue perspective?' I have heard that."
- "...Terry's not here to be held accountable... so basically, <<LUS Employee>> doesn't want to be, have to be, accountable for it. Which I, I mean, I respect."



MAY 2019

Staff Interviews Begin

Other Comments

- Looking at Table 12 in the PSC audit memorandum, are there any others that we're going to have similar questions about? "No, these we all <u>actually provide actual</u> <u>service."</u>
- What else, if anything, is out there? "If somebody said 'Do you need 30 megabit at that location? Do you need 100 at that location?...Do you need all of your bandwidth right now?' My answer would be 'probably not.""

MAY 2019

Staff Interviews Begin

Other Comments

- Once online in 2014, did the Smart Meter capabilities system essentially provide the same or more information as POMS? "Yes, way more."
- When asked whether POMS was expensed under telecommunications, it was pointed out "these are in contractual services," spread throughout "four divisions and these divisions have pretty high contractual services..."



JULY 8, 2019

2nd PSC Self-Report



Joel Robideaux Mayor-President / Maire-Président

Commissioner Craig Greene

Commissioner Eric Skrmetta

433 Metairie Road, Suite 406

Metairie, LA 70005

Baton Rouge, LA 70810

Louisiana Public Service Commission

10713 North Oak Hills Pkwy., Suite B

Louisiana Public Service Commission

July 8, 2019

VIA HAND DELIVERY

Commissioner Lambert C. Boissiere, III Louisiana Public Service Commission 1450 Poydras, Suite 1402 New Orleans, LA 70112

Commissioner Foster L. Campbell Louisiana Public Service Commission 415 Texas Street, Suite 100 Shreveport, LA 71101

Commissioner Mike Francis Louisiana Public Service Commission 222 N. Parkerson Avenue Crowley, LA 70526

> RE: Lafayette Utilities System - Communications Division Power Outage Monitoring System charges

Dear Commissioners:

The purpose of this letter is to self-report a possible violation of the Commission's Cost Allocation and Affiliate Transaction Rules (Rules) and the Local Government Fair Competition Act (FCA).

The facts outlined in this letter recently came to my attention during our review of the Public Service Commission (PSC) staff audit report and in conjunction with our internal budget process. Specifically, during our current budget process I learned that the Lafayette Utilities System (LUS) "Power Outage Monitoring System" (POMS) was being eliminated from LUS's budget. This fact coincided with the PSC staff audit report that highlighted substantial monthly billings from the Communications Division (Table 12), namely \$1,013,400 of affiliated charges billed to LUS for "Power Outage Monitoring."

I began investigating the utilization of POMS and discovered that LUS has paid the Communications Division for POMS since November 2010. The payments ranged from a little over \$20,000 per month in the first year to more than \$84,000 per month thereafter. Terry Huval, former director of both LUS and its Communications Division, described POMS as a notification system that would enable LUS to respond more quickly to power outages. POMS would use software developed by LUS to analyze existing signals from existing Communications Division equipment at customers' homes and businesses to identify and locate outages. Questions remain as to whether POMS was utilized as anything other than a second or third tier redundant data

was of significant value to LUS in identifying he vast majority of LUS's electric grid, since s only a fraction of LUS's customer base. In " to LUS customers rather than "cost" to the

pas Division to provide the POMS service to seed charging for POMS based on the cost of ir month per tap for all 3,574 taps. Huval then the 989 taps with two or more connections, wice from third parties. The Communications all 3,574 taps, which they said would be the rumentation for any of these revenue options les, and these revenue options were dropped.

combination of the cost of outages to LUS tages, noting that this was much less than the cost to customers was based on a report by A) concluding that a 60-minute, LUS-wide 32. Additionally, LUS stated that its revenue e loss figures were added together for a total MS was predicted to reduce the 60-minute an additional 20% to be "conservative." The

ed the Communications Division to charge b. The LEDA report and basis for the revenue tions Division files. Both figures assumed an cally affect only portions of the system.

OMS charge to be increased to \$84,450 per ng that a reduction in average power outage \$2.03 million per year. No explanation was dramatically from the first. Huval increased alf of this savings, \$1.013 million per year found in LUS or Communications Division no outage of the entire LUS system, though DMS, also in July 2011, Lafayette Consolidated him of the requirement to use the full-cost accounting lysis of the cost to the Communications Division to nunications Division files.

e memo to himself in April 2018, shortly before his ny analysis of the cost to provide POMS. It is unclear self, which retireates the conclusions of the prior as that Huval based the charge on estimated savings t this remained the basis through 2018. In the te, management's justification based on savings to five service (the phone lines to the taps) are the only

at the charge for POMS was originally based on an substantially increased based on a new estimate of of any analysis or consideration of the cost to the IS in determining the charge. In this regard, it is ommunications Division was insignificant because mequipment and LUS internally built the software

le to parties other than LUS. The Rules require that services between the separate division created to invision that are not provided to unaffiliated outside ounting methodology." PSC Gen'l Order R-28270 famual imposes an identical requirement. LUS Cost 11-12

LUS customers, instead of the actual cost to the ite, appears to be an improper affiliate charge in fing on whether the charge exceeds the full cost of requirement of the Fair Competition Act that "[a] overed services with tax dollars, income from other other means," La. R. S. 43844.53(2).

the Commission dated April 14, 2018, steps have charges in the future by separating the directorship into two separate positions; and by improving goods and services are charged between LUS and LUS Interim Director Jeffrey Stewart has eliminated al year budget for the 2019-2020 fiscal year.

elevant to the current Commission staff audit. It is e POMS charge was not detected or disclosed nature of the transaction, LUS will report these facts red in the upcoming audit for the most recent fiscal ules or the FCA has occurred. The latest attest audit d with the Commission by August 2019.

Robideaux

avor-President

705 West University Avenue / P.O. Box 4017-C / Lafavette. LA 70502 / p.337.291.8309 / 1.337.291.8399 / irobidaaux@iafavettela.gov / lafavettela.gov



MAR 2018 – OCT 2019

Timeline



